



6. I am not an employee of Sierra Club. I have never been an employee of Sierra Club.

7. Typically I perform my duties as Sierra Club president and chair of its Board of Directors from my home in Los Angeles, California.

8. On September 23, 2024, I spoke at a virtual press conference hosted on Zoom (the “Virtual Press Conference”) regarding Sierra Club’s September 23, 2024 lawsuit against ExxonMobil filed in the Superior Court of California, County of San Francisco.

9. I did not invite anyone to attend the Virtual Press Conference.

10. My statements at the Virtual Press Conference were not directed at Texas or its residents. Texas was not “the” or even “a” focal point of my statements at the Virtual Press Conference.

11. ExxonMobil’s Complaint (Paragraph 91) attributes to me the following statements: “our environment and health were being sacrificed just to protect ExxonMobil’s bottom line,” and “ExxonMobil’s ‘days of polluting with impunity are over.’” These are not accurate quotations of my actual words at the Virtual Press Conference.

12. I did not receive a request for correction, clarification or retraction from ExxonMobil about my statements at the Virtual Press Conference.

13. I am not aware of anyone at Sierra Club receiving a request for correction, clarification or retraction from ExxonMobil about my statements at the Virtual Press Conference.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 21, 2025

By:

  
Allison Chin